

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CITIBANK, N.A.,

Plaintiff,

v.

ARALPA HOLDINGS LIMITED PARTNERSHIP
AND RODRIGO LEBOIS MATEOS,

Defendants.

No. 22-cv-08842 (JLR)

DECLARATION OF DANIEL J. SAVAL

Pursuant to 28 U.S.C. § 1746, I, Daniel J. Saval, declare as follows:

1. I am a partner at Kobre & Kim LLP and counsel in this proceeding. I make this declaration based on my personal knowledge, and upon my review of documents. I submit this declaration in support of Third Parties' and Defendants' Opposition to Citibank N.A.'s Motion for the Issuance of a Writ of Execution and Turnover Order to Enforce Judgment Against One57 36B, LLC and Aralpa Miami Investments, LLC, for Prejudgment Attachment, and to Compel Responses to Information Subpoena.

2. I have attached as Exhibit 1 a true and correct copy of an email from Citibank counsel Samuel Rubin dated November 22, 2022, attaching "the last iteration of the term sheet," which in turn attaches an email from Citibank's counsel dated September 9, 2022, and document dated September 8, 2022, entitled "Summary Terms and Conditions for Payment Agreement."

3. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed: January 12, 2024

/s/ Daniel J. Saval
Daniel J. Saval